

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HUDA FAKHREDDINE, TROUTT
POWELL, and PENN FACULTY FOR
JUSTICE IN PALESTINE,

Plaintiffs,

v.

THE UNIVERSITY OF PENNSYLVANIA,

Defendant.

No. 2:24-cv-01034 (MSG)

DECLARATION OF DAVID GRINGER

I, David Gringer, declare as follows:

1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent the University of Pennsylvania in the above-captioned action. I am familiar with the facts set forth in this declaration.

2. I submit this declaration in support of Penn's Motion to Dismiss Plaintiffs' Complaint with Prejudice and Opposition to Plaintiffs' Motion for Preliminary Injunction.

3. On January 24, 2024, Representative Virginia Foxx, Chairwoman of the Committee on Education and the Workforce of the United States House of Representatives sent a letter to Mr. Ramanan Raghavendran, Chairman of Penn's Board of Trustees, and Dr. Larry Jameson, Interim President of Penn, requesting Penn produce documents on 25 enumerated topics.

4. In Penn's submissions to the Committee on Education and the Workforce, Penn has made limited redactions of personally identifiable information, including names, email addresses, phone numbers, and addresses, as well as student education record information in accordance with the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g).

5. Attached as Exhibit 1 is a true and correct copy of the January 24, 2024 letter from Rep. Foxx to Mr. Raghavendran and Dr. Jameson, found at https://edworkforce.house.gov/uploadedfiles/penn_letter_final_v2.pdf.

6. Attached as Exhibit 2 is a true and correct copy of the September 12, 2023 statement of former Penn President Liz Magill, et al., *Statement on Palestine Writes Literature Festival*, found at <https://penntoday.upenn.edu/announcements/statement-palestine-writes-literature-festival>.

7. Attached as Exhibit 3 is a true and correct copy of the February 7, 2024 article by Ethan Crawford in *The Daily Pennsylvanian* titled “Penn begins submitting documents to House education committee for antisemitism investigation,” found at <https://www.thedp.com/article/2024/02/penn-congress-house-education-workforce-investigation-submit-documents>.

8. Attached as Exhibit 4 is a true and correct excerpted copy of Penn’s Faculty Handbook, found at <https://catalog.upenn.edu/pdf/2023-2024-facultyhandbook.pdf>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 7, 2024, at New York, New York.

Dated: May 7, 2024

/s/ David Gringer

David Gringer